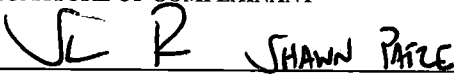



CRIMINAL COMPLAINT

United States District Court	DISTRICT of ARIZONA
United States of America	DOCKET NO.
v. Jovany Alonso Robledo-Delgado ; DOB: 1986; Mexican Citizen Jesus Guillermo Martinez-Salgado ; DOB: 1995; Mexican Citizen	MAGISTRATE'S CASE NO. 19-07860MJ
Complaint for violation of Title 21, United States Code, Section 846	
COMPLAINANT'S STATEMENT OF FACTS CONSTITUTING THE OFFENSE OR VIOLATION: Beginning at a time unknown, and continuing to on or about December 17, 2019, at or near Nogales, in the District of Arizona, Jovany Alonso Robledo-Delgado and Jesus Guillermo Martinez-Salgado , named herein as defendants and co-conspirators, did knowingly and intentionally combine, conspire, confederate and agree together and with other persons known and unknown to possess with intent to distribute 400 grams or more of a mixture or substance containing a detectable amount of fentanyl, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(vi); 50 grams or more of methamphetamine, or 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A)(viii); 500 grams or more of cocaine, a Schedule II controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(ii)(II); and 100 grams or more of heroin, a Schedule I controlled substance; in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)(i). All in violation of Title 21, United States Code, Section 846.	
BASIS OF COMPLAINANT'S CHARGE AGAINST THE ACCUSED: On December 17, 2019, at approximately 8:29 p.m., Homeland Security Investigations Special Agents and Task Force Officers (herein after referred to as agents) executed a court ordered search warrant at an address in Nogales, Arizona. Upon entry, agents immediately detained Jovany Alonso ROBLED0-Delgado. The initial search of the building resulted in the discovery of a man-made subterranean tunnel that led to the sewage system that flows from Mexico. Agents observed packaging in the front room that appeared to be consistent with narcotics packaging. Agents searched the man-made subterranean tunnel and discovered additional narcotics packaging. As agents were conducting their search, another individual appeared further down the tunnel and was making his way to the tunnel exit. The individual was later identified as Jesus Guillermo MARTINEZ-Salgado. Agents seized 18 packages of suspected narcotics from the building. Agents opened the packages and found 187 sub-packages inside. Representative samples of the contents of the 187 sub-packages were field tested and yielded positive results for the properties of fentanyl, methamphetamine, cocaine, and heroin. The packages of fentanyl weighed 3.06 kilograms. The packages of methamphetamine weighed 90.99 kilograms. The packages of cocaine weighed 1.02 kilograms. The packages of heroin weighed .66 kilograms.	
CONTINUED ON REVERSE	
MATERIAL WITNESSES IN RELATION TO THE CHARGE:	
REQUEST DETENTION Being duly sworn, I declare that the foregoing is true and correct to the best of my knowledge. KCH/am AUTHORIZED AUSA <i>Kevin Hakala</i>	SIGNATURE OF COMPLAINANT  OFFICIAL TITLE SPECIAL AGENT
Sworn to before me and subscribed in my presence.	
SIGNATURE OF MAGISTRATE JUDGE¹⁾ 	DATE December 18, 2019

¹⁾ See Federal rules of Criminal Procedure Rules 3 and 54

BASIS OF COMPLAINANT'S CHARGE AGAINST THE ACCUSED CONTINUED:

After waiving his *Miranda* rights, ROBLEDO said he constructed the subterranean tunnel discovered in the building. ROBLEDO stated the tunnel was constructed to breach the sewage system that comes from Mexico into the United States (U.S.) with the intent to smuggle narcotics into the U.S. ROBLEDO stated he believed the packages contained marijuana. ROBLEDO said he was paid \$200 U.S. Dollars while he was constructing the tunnel. ROBLEDO stated he was paid \$3,000 per smuggling event after the tunnel was completed.

After waiving his *Miranda* rights, MARTINEZ claimed he was forced to work in the subterranean tunnel by unknown individuals from Mexico in order to pay off a debt he owed to the drug smuggling organization. MARTINEZ said he would enter the subterranean tunnel where ROBLEDO would hand him packages of narcotics. MARTINEZ said he would then carry the packages of narcotics into the building. MARTINEZ claimed that he has been paid a total of \$500 since working in the tunnel. MARTINEZ admitted he knew the packages taken out of the tunnel were narcotics.